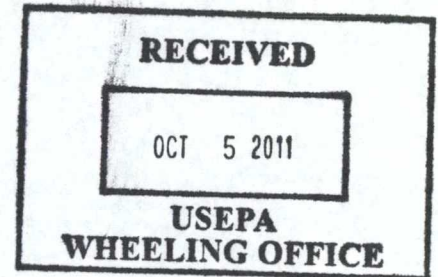

Southpointe Energy Complex • 370 Southpointe Boulevard, Suite 100 • Canonsburg, Pennsylvania 15317
kkomoroski@fulbright.com • Direct: 724 416 0420 • Main: 724 416 0400 • Facsimile: 724 416 0404

October 4, 2011

VIA E-MAIL AND FEDERAL EXPRESS

Karen Melvin
Associate Division Director
Office of Enforcement
Hazardous Site Cleanup Division
U.S. Environmental Protection Agency, Region III
Oil and Prevention Branch (3HS61)
1060 Chapline Street
Wheeling, WV 26003



Re: August 5, 2011 Request for Information

Dear Ms. Melvin:

Enclosed please find the response to your information request of August 5, 2011. Thank you for the courtesies you extended in submittal of this response.

Sincerely,

A handwritten signature in cursive script that reads "Ken Komoroski".

Kenneth Komoroski

KSK

Enclosures: Responses

cc: James Van Orden, Esq.
Paula Curtin

**Range Resources-Appalachia, LLC's Responses to the
United States Environmental Protection Agency's Request for Information**

The August 5, 2011 request for information (the "Request") of the U.S. Environmental Protection Agency ("EPA") seeks to obtain information regarding an alleged or possible discharge of oil and/or hazardous substances on July 13, 2011 at the Yeager Impoundment, Amwell Township, Washington County, Pennsylvania, which is owned and operated by Range Resources-Appalachia, LLC ("Range"). Range is not aware of any release of oil or any hazardous substance at or near its Yeager Impoundment on or about July 13, 2011 Range is aware that on that date a landowner neighboring the property on which the Yeager Impoundment is located reported observing gas bubbling near a small stream located in the general vicinity of the Yeager Impoundment ("Observed Bubbling"). Based upon the timing and location of the Observed Bubbling, Range believes that to be the event to which EPA is referring and is requesting information in its Request. Range is providing its response accordingly.

The Request was issued under the auspices of obtaining information regarding a possible violation of Section 311(b)(3) of the Federal Water Pollution Control Act, 33 U.S.C. § 1321(b)(3). Section 311(b)(3) prohibits discharges of hazardous substances in excess of quantities as provided by 40 C.F.R. § 117.3. No such release occurred – in fact, no substance was released by Range in connection with the Observed Bubbling – and EPA's Request is without legal basis under the identified statutory or regulatory authority. Notwithstanding the lack of legal authority for the Request, Range voluntarily provides the following responses ("Responses"). However, as the Request seeks information not specifically pertaining to a discharge of oil and/or hazardous substances, the Request is both beyond the EPA's investigatory authority as provided by 33 U.S.C. § 1321(b)(3) and 40 C.F.R. § 117.3 and unreasonable under the circumstances.

Further, the Request seeks information pertaining to a "Facility." Range notes that the Enclosure 1 does not define the word "Facility" as a standalone term; Enclosure 1 defines specific types of facilities, such as an "Onshore Facility." Consequently, the use of the term Facility as a standalone term is ambiguous. Range has interpreted information requests incorporating the term "Facility" as seeking information related to structures and equipment at or near the Yeager Impoundment and has voluntarily responded accordingly thereto.

RESPONSES

1. Identify all substances released from the Facility in connection with the above referenced Regional Response Center Spill Number or Numbers. Specifically, identify:
 - a. The name and Chemical Abstract Services ("CAS") Number for each substance discharged;
 - b. For oils, identify the type and grade;
 - c. Provide the quantity, concentration of each substance discharged and the method by which the concentration was measured or estimated. For mixtures, provide the name, quantity, and concentration of each constituent of that mixture;
 - d. Provide the solubility and specific gravity of each substance discharged.

Response: On July 13, 2011, a landowner neighboring the Yeager Impoundment reported observing bubbling in a small stream near the impoundment. On the same day, representatives of Range and the Pennsylvania Department of Environmental Protection ("DEP") visited the stream and collected samples of the gas bubbling. Isotopic analysis and radiocarbon dating analyzed by Range's expert consultant Civil & Environmental Consultants, Inc. ("CEC") confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC's report is attached at Tab 1. No substances, hazardous or otherwise, were released by Range in connection with the Observed Bubbling.

2. Describe the physical source (including, but not limited to vehicle, outfall, tank, container, pipe, ditch, conduit, or equipment) at the Facility from which the oil and/or hazardous substance or substances (the term "substance" as used here includes both oils and hazardous substances) initially was discharged on or around July 13, 2011. If the substance was discharged from more than one source, please identify each specific source.

Response: No release of oil and/or hazardous substances occurred in connection with the Observed Bubbling. As such, there was no "physical source" of a "substance"

“discharged”. Isotopic analysis and radiocarbon dating analyzed by Range’s expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC’s report is attached at Tab 1. No substances, hazardous or otherwise, were released by Range in connection with the Observed Bubbling.

3. Provide the total quantity of undiluted substance(s) released from the Facility in gallons for oils and in pounds for hazardous substances.

Response: No substances were released by Range in connection with the Observed Bubbling. Bubbling was observed in a small stream near the Yeager Impoundment. Isotopic analysis and radiocarbon dating analyzed by Range’s expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC’s report is attached at Tab 1.

4. List the location of the discharge, including the closest street address, the city, county, state, zip code, and provide the Global Positioning System ("GPS") coordinates.

Response: There was no “discharge” by Range in connection with the Observed Bubbling. A landowner reported observing gas bubbling in a small stream near the Yeager Impoundment, which is located near McAdams Road, Amwell Township, Washington County, Pennsylvania. Isotopic analysis and radiocarbon dating analyzed by Range’s expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC’s report is attached at Tab 1.

5. List the starting time, date, and duration of the discharge and the time and date when the discharge entered a waterway.

Response: There was no “discharge” by Range in connection with the Observed Bubbling. As such, there was no “time and date when the discharge entered a waterway.” On July 13, 2011, a landowner reported observing gas bubbling in a small stream near the Yeager Impoundment. Isotopic analysis and radiocarbon dating analyzed by Range’s expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC’s report is attached at Tab 1.

6. List the time and date of the discovery of the discharge and the person(s) who made the discovery.

Response: On July 13, 2011, a landowner neighboring the Yeager Impoundment, Beth Voyles, reported observing bubbling in a small stream near the impoundment. On the same day, representatives of Range and DEP visited the stream and collected samples of the gas bubbling. Isotopic analysis and radiocarbon dating analyzed by Range’s expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC’s report is attached at Tab 1. No substances, hazardous or otherwise, were released by Range in connection with the Observed Bubbling.

7. List the federal and state agencies, if any, to which the owner and/or operator reported the discharge(s), the dates and times on which the reports were made, and the name(s) and title(s) of the person(s) who made the reports.

Response: Range did not report the Observed Bubbling as it did not discover the bubbling and as it had not released any substance necessitating any reporting. On July 13, 2011, a landowner neighboring the Yeager Impoundment reported to DEP observing bubbling in a small stream near the impoundment. On the same day, representatives of Range and DEP visited the stream and collected samples of the gas bubbling. Isotopic

analysis and radiocarbon dating analyzed by Range's expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC's report is attached at Tab 1. No substances, hazardous or otherwise, were released by Range in connection with the Observed Bubbling.

8. Identify the first body of water that the substance reached. Identify the actual or estimated quantity of the substance(s) that entered that water body. Describe the location of any other water bodies that the substance(s) subsequently entered, including the actual or approximate distance from the Facility. In addition, state the actual or estimated quantity of the substance(s) that entered those additional water bodies.

Response: There was no substance released by Range in connection with the Observed Bubbling. As such, there was no "first body of water that the substance reached." On July 13, 2011, a landowner reported observing gas bubbling in a small stream near the Yeager Impoundment. Isotopic analysis and radiocarbon dating analyzed by Range's expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC's report is attached at Tab 1.

9. Identify any storm drains or sewers through which the substances flowed, and identify the waters to which those storm drains or sewers subsequently drain. State the actual or estimated quantity of the substance(s) that entered the storm drain or sewer.

Response: The Observed Bubbling was ambient air, carbon dioxide, and microbial methane, which did not enter a storm drain or sewer.

10. Identify whether each water identified in response to Questions 8 and 9 was, at the time of the spill, a "navigable water" as defined in Enclosure 1, a tributary of a navigable water; and/or physically connected to a navigable water. Identify all such navigable waters by name and identify the type of body of water (e.g. river, stream, lake, creek, or other type of body of water).

Response: There was no substance released by Range in connection with the Observed Bubbling. As such, in response to Questions 8 and 9, Range has not identified any body of water nor water system.

11. If no navigable waters are identified in response to Questions 8-10, identify whether the water system at any time connects with or flows into any hydrological system (such as a creek system). If so, identify the flow, extent, and duration of the connection to that system.

Response: There was no substance released by Range in connection with the Observed Bubbling. As such, in response to Questions 8 through 10, Range has not identified any body of water or water system.

12. State the flow in cubic feet per second of each water body described in response to Questions 8 and 9. If there is no gauge station in the vicinity, please estimate the flow and provide the basis for that estimate.

Response: There was no substance released by Range in connection with the Observed Bubbling. As such, in response to Questions 8 and 9, Range has not identified any body of water nor water system.

13. Provide a description and the location of any adjoining shoreline upon which that substance may have reached. In addition, state the quantity of the substance that reached the adjoining shoreline.

Response: There was no substance released by Range in connection with the Observed Bubbling. As such, no substance released by Range reached “any adjoining shoreline.”

14. For all discharges of oil to navigable waters, adjoining shorelines to navigable waters, or to any other water/shoreline, please indicate the following
 - a. Did you observe from the oil a film, sheen, discoloration or iridescent appearance on the surface or shoreline of any water? If yes, please describe your observations;

- b. Did, to your knowledge, any other person observe from the oil a film, sheen, discoloration or iridescent appearance on the surface or shoreline of any water? If yes, please identify all such persons and describe those observations;
- c. Did you observe any oil sludge or oil emulsion beneath the surface or on the adjoining shorelines of any water? If yes, please describe your observations;
- d. Did, to your knowledge, any other person observe any oil sludge or oil emulsion to be deposited beneath the surface or on the adjoining shorelines of any water? If yes, please identify all such persons and describe those observations.

Response: The Observed Bubbling did not involve a discharge of oil. No film, sheen, discoloration or iridescent appearances were observed. Testing confirmed the Observed Bubbling was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. No adverse environmental impacts occurred.

15. Describe any damage to animal life or vegetation that you observed or otherwise have knowledge of.

Response: No damage to animal life or vegetation was observed nor would any be expected from the Observed Bubbling, which was determined to be ambient air, carbon dioxide, and microbial methane bubbling at the surface of a small stream.

16. List the name, address, telephone number, and affiliation of any and all persons who made any observations in response to Questions 14 and 15.

Response: The Observed Bubbling was determined to be ambient air, carbon dioxide, and microbial methane bubbling at the surface of a small stream. It was not a release of oil and did not reach a shoreline. No oil sheen, film, or discoloration was observed at the stream. No damage to animal life or vegetation was observed nor would any be expected from the bubbling of air, carbon dioxide, and microbial methane.

17. Identify the effect of the spill(s) on any water supply and give details if available (e.g., shutdown of public or private water supply). Provide the names and addresses of all persons that have been provided with an alternative water supply (e.g., bottled water) due to the spill or because of the threatened migration of contamination.

Response: The Observed Bubbling was ambient air, carbon dioxide, and microbial methane at the surface of a small stream and was not a “spill”. There was no effect on water supply, public or private, nor would any be expected. Therefore, it was not necessary to provide an alternative water supply to anyone as a result of the Observed Bubbling. The Observed Bubbling was not caused by any of Range’s activities or operations.

18. Does the facility have a National Pollutant Discharge Elimination System (NPDES) Permit or permit application? If yes, provide the permit number or, if no permit number has been issued at the time, the date upon which the application was filed.

Response: Range does not have an NPDES permit in connection with any of its operations in or around the Yeager Impoundment or the surrounding well sites as none is required by either Federal or Pennsylvania law.

19. If the substance(s) was discharged from an outfall, state whether the outfall was covered by an NPDES permit issued pursuant to Section 402 of the Act.

Response: No substances were discharged by Range in connection with the Observed Bubbling. Range does not have an NPDES permit in connection with any of its operations in or around the Yeager Impoundment or the surrounding well sites as none is required by either Federal or Pennsylvania law.

20. Identify all NPDES or state wastewater discharge permit conditions and/or water quality standards that may have been violated by the spill.

Response: No substances were discharged by Range in connection with the Observed Bubbling. Range does not have an NPDES permit in connection with any of its

operations in or around the Yeager Impoundment or the surrounding well sites as none is required by either Federal or Pennsylvania law.

21. Provide a complete description of the cause or causes of the discharge (e.g., pump failure, by-pass of treatment system), as well as any other relevant circumstances. If the discharge was caused by the actions of a third party (for instance, as the result of an accident or vandalism), describe in detail the measures that were in place to prevent such actions. For vandalism, identify any enforcement agencies to which the owner or operator reported the vandalism.

Response: On July 13, 2011, a landowner neighboring the Yeager Impoundment reported observing bubbling in a small stream near the impoundment. On the same day, representatives of Range and DEP visited the stream and collected samples of the gas bubbling. Isotopic analysis and radiocarbon dating analyzed by Range's expert consultant CEC confirmed the gas was a mixture of ambient air, carbon dioxide and methane and was microbial (biogenic) in nature. A copy of CEC's report is attached at Tab 1. No substances, hazardous or otherwise, were released by Range in connection with the Observed Bubbling.

22. Describe all steps taken to contain and clean up the spill(s) and to mitigate any environmental damage and/or threat to human health.

Response: No substances were released or discharged by Range in connection with the Observed Bubbling. No steps have been taken, nor are any necessary or appropriate, in response to the Observed Bubbling. The Observed Bubbling was a naturally-occurring event resulting in no harm to the environment or human health or welfare.

23. Describe any actions taken or planned to prevent the recurrence of incidents such as the release(s) identified above.

Response: No actions have been taken nor are planned to prevent an occurrence similar to the Observed Bubbling, as none are necessary or required. The Observed

Bubbling was a naturally-occurring event resulting in no harm to the environment or human health or welfare.

24. List the names, addresses, telephone numbers, and affiliations (e.g., name of governmental agency, contractor, or other entity) of all persons who were on the scene during the incident and/or during cleanup operations, as well as any other persons not present but otherwise believed to have knowledge of the facts surrounding the incident or incidents. For each person identified in response to this question, provide the time period during which they were present at the facility. In responding to this question, for each complaint by an individual you have received related to your operations at the Facility, provide the person's name and phone number, as well as any written record of that complaint or a written narrative describing any oral complaint; Provide any subsequent communications with the party(ies) that filed the complaint.

Response: The Observed Bubbling did not involve any "incident" nor were any "cleanup operations" necessary or appropriate. However, following nearby resident's report to DEP, various representatives of Range and DEP were at the Yeager Impoundment and adjacent stream to conduct testing on July 13, 2011.

25. Provide the date on which operations began at the Facility. Identify all Natural Gas Production Facilities (NGPFs) (as further defined in Enclosure 1) owned and/or operated by you connected to or otherwise associated with the Facility at any time. Identify all components of each NGPF, including but not limited to wells, piping, tanks, other equipment, and surface impoundments.

Response: See Responses to Inquiry Nos. 1 and 21.

26. Provide the name(s) and addressees) of the owner(s) of the Facility described above in Question 25. In doing so, for all production facilities identified in response to Question 25, state the date that the owner obtained ownership and/or control over the production facilities and provide all documents evidencing or relating to such ownership, operation or lease, including but not limited to purchase and sale agreements, deeds, and leases.

Response: See Response to Inquiry No. 1.

27. Identify all drill pads and/or drill rigs owned and/or operated by you at or within 10 miles of the Facility at any time. For each drill pad and/or drill rig, identify the year on which that drill pad and/or rig was installed at its present location and any past location.

Response: Range operates several natural gas wells located near the Yeager

Impoundment.

28. Provide the name and address of the operator(s) of the Facility described above in Question 25 and describe the relationship between the owner(s) and operator(s) (i.e., employee, subcontractor, lessee, etc.). Identify any persons who concurrently with you exercised actual control or who held significant authority to control activities at the Facility at any time. In answering this question, include:
- a. Partners and/or joint ventures;
 - b. Every contractor, subcontractor, or licensor with any presence or activity at the Facility (e.g., service contractors, remediation contractors, management and operator contractors, licensor providing technical support for licensed activities);
 - c. All persons who exercised actual control over any activities or operations at the Facility;
 - d. All persons who held significant authority to control any activities or operations at the Facility;
 - e. All persons who had a significant presence or who conducted significant activities at the Facility;
 - f. All government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity at the Facility.

Response: See responses above.

29. Identify all prior owners and operators of the production facilities identified in response to Question 25 and the drill pads identified in response to Question 27. For each prior owner/operator, identify:
- a. The dates of installation, ownership, and/or operation;
 - b. All evidence of the activities that were conducted at the production facilities and drill pads at that time, including but not limited to any information about wells installed, operated, and/or decommissioned during any period of prior ownership/operation;
 - c. All integrity test results, materials inventories, and/or notifications and reports made to and received from local, state, and federal authorities; and
 - d. Any information you have access to regarding the substances used in connection with the production facilities during any period of prior ownership/operation.

Response: Range owns and operates the natural gas wells identified in Response to Inquiry No. 27.

30. Describe the nature of the work conducted by you at each NGPF identified in response to Question 25. For each NGPF owned or operated by you, provide information on the installation, operation, and maintenance of those production facilities. Your response should include, but not be limited to the following for each well:
- a. The name or identifier of each well;
 - b. Well construction information (including specifications on casing depths, cement tops/bottoms, and perforated zones);
 - c. Well maintenance information (including logs and inspection records);
 - d. Well incident information (including fluid loss during drilling or storage, cement loss, problems during hydraulic fracturing or other operations). Provide any root cause analysis conducted and corrective actions taken in response;
 - e. Well lithologic logs (also known as "mud logs"); and
 - f. The constituents contained in as well as the quantities of those constituents in any produced water, brine and/or, any other fluids associated with those wells.

Response: See Response to Inquiry No. 25.

31. Identify any contractors used by you that conducted any activities related to the wells identified in response to Question 30. For each contractor, identify:
- a. The dates that they conducted work;
 - b. The nature of the work they conducted.

Response: See Response to Inquiry No. 25.

32. Identify any other leaks, spills, or releases of oil and/or hazardous substances into the environment that have occurred from the Facility. For each such release, provide the following:
- a. date;
 - b. duration of the release;
 - c. substance(s) released;

- d. the approximate quantity of the substance(s) released;
- e. the origin of the release;
- f. the cause of the release;
- g. the location of the release;
- h. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- i. The result of any and all investigations of the circumstances, nature, extent or location of the release or threatened release, including the results of any soil and water (ground and surface) testing undertaken;
- j. Whether any persons were provided with an alternative water supply; and
- k. All persons with information related to these releases.

Response: There have been no Federal reportable quantity releases from the Yeager Impoundment location.

- 33. Provide any other reports, information or data related to activities conducted at or near the wells by you, your predecessors, contractors, and/or any other entity.

Response: Other than the CEC Report, which is attached at Tab 1, there are no reports or additional pertinent information in Range's possession to provide related to the Observed Bubbling.

- 34. Provide a complete inventory of any compounds used at all NGPFs identified in response to Question 25. Include the chemical composition, characteristics, physical state of each compound, along with the MSDSs, CAS Numbers, and product names.

Response: See Response to Inquiry No. 1.

- 35. Provide all documents, reports, information, or data collected related to the substances placed into and taken from the wells possessed by you or any party related to you by contract or otherwise. Your response should include, but not be limited to:
 - a. Analysis of production water constituents;

- b. Analysis of condensate constituents;
- c. Drilling fluid components (Material Safety Data Sheets (MSDSs), Chemical Abstract Systems (CAS) Numbers, product names);
- d. Water/geochemistry analysis from discrete production zones.
- e. Provide the following information (including any reports that include such information) related to the injection of substances into the wells by you or any other person, including but not limited to:
- f. Hydraulic fracturing fluid components (including MSDS, CAS Number, product names);
- g. Workover fluids (including all underlying components of workover fluids) (including MSDS, CAS Number, product names);
- h. Formation fracturing records for wells (including the depths and dates).

Response: *See Responses to Inquiry Nos. 1 and 33.*

- 36. Provide all reports, data or other information related to soil, water (ground and surface) and geology/hydrogeology at and around the Site. Provide copies of all documents containing such data or information, including past and present aerial photographs as well as documents containing the basis for and/or analysis or interpretation of that data or other information.

Response: Range is not aware of any responsive information related to the Observed Bubbling other than that which is included herein and identified in Response to Inquiry No. 33.

- 37. Describe the storage units at the Facility (e.g., above ground tanks or underground tanks) and provide the types of substance(s) stored and the total storage capacity of each storage unit by name and CAS number. In answering this question, include substances and capacities of "oil-filled equipment" and "mobile refuelers" that are defined in *Enclosure 1*. Identify the storage units and provide the storage capacity of each unit identified with each NGPF and identify the types of substance(s) stored and the total storage capacity of each storage unit by name and CAS number for those units. In responding to this question, indicate whether each substance is an oil and/or a hazardous substance.

Response: No aboveground or underground storage tanks were involved.

- 38. Has any contaminated soil ever been excavated or removed from areas around or near the wells? If so, provide the following:

- a. Amount of soil excavated;
- b. The substances contained in the excavated soil;
- c. Location of excavation;
- d. Distance from a navigable water of the United States or an adjoining shoreline;
- e. Description of the pathway from the excavated soil area to a navigable water of the US or an adjoining shoreline, including topography and an analysis of whether the materials could reach a navigable water or adjoining shoreline;
- f. Any information, including data, maps, and reports, related to any plume of substances associated with any soil excavation.

Response: No soils were excavated, nor were any required or expected to be excavated, in connection with the Observed Bubbling.

39. If the Owner or Operator has in place a Spill Prevention, Control and Countermeasures ("SPCC") Plan pursuant to 40 C.F.R. Part 112, a Facility Response Plan ("FRP") prepared pursuant to 40 C.F.R. § 112.20, a state oil spill prevention plan, and/or some other spill prevention plan, provide EPA with a copy of all such plans. Please indicate whether a professional engineer prepared and/or certified any plan in place at the Facility. In the event the plan is undated, provide the date(s) on which the plan was prepared and implemented.

Response: A Preparedness Preventions and Contingency Plan ("Plan") is attached at Tab 2.

40. Provide a description of all procedures used to prevent and/or contain spills of substances from the Facility. This description should indicate the tanks, tank cars, tank trucks, or other equipment that are protected by dikes, the amount of material that can be contained by each dike, and the number of tanks, tarue cars, tank trucks, and other equipment protected by each dike.

Response: See Response to Inquiry No. 23.

41. Indicate the material used to construct each dike and the condition of each dike listed in Question 40.

Response: See Response to Inquiry No. 23.

42. In the event that the Owner or Operator does not have in place a SPCC Plan, FRP or state oil prevention plan, describe any actions taken or proposed to prevent the recurrence of any spill identified in response to Question 1.

Response: *See Response to Inquiry No. 39.*

43. List any other information you wish to bring to the attention of the federal government at this time related to this matter.

Response: *See responses above.*